

**Alternatives Analysis Sub-committee Meeting
November 20, 2009**

DEQ's internal conclusion as to what factors best comprise an Alternatives Analysis for purposes of the authorizing provision (MCA 75-5-313) include:

1. Land application
 - a. must meet GW discharge permit specifications
 - b. must be applied at agronomic rates
2. Total or seasonal retention
 - a. Discussed snow-fluent (Frozen discharge)
 - b. Seasonal discharge to GW (pending site-specific analysis)
 - c. Discharge by hydrograph
3. Trading

For all of these, site-specific analyses may result in a modified option. Land application and retention are considered somewhat "cookbook".

This will have to be an iterative process. How can permits address an iterative process? POTWs will want a standing DEQ/EPA committee to review and provide input at various levels of the analysis. Guidelines on the level of analysis needed would be helpful. Perhaps this would be a 2-tier process with Tier 1 examining the possibility of the 3 non-discharging options above.

What about the possibility of selecting "bins" for nutrient removal? For example, if a POTW must apply for a variance, could we allow bins such as:

WQS	N	P
	0.3	0.05
	3	0.05-0.1
	5	0.1 – 0.5
	10	1

Then, based on affordability, you could be looking at a bin or category but not trying to fall somewhere "in between". The cost-cap could be used to treat to one of the technology "bins".